

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF T.D.

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NO. 2:25-cv-00244-LK

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, T.D., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I have chosen to submit this declaration using only initials because I am fearful
5 that the government could retaliate against me or my child. I also worry that individuals
6 emboldened by the federal government's recent actions could target my family for submitting
7 this declaration.

8 3. I am the wife of a commanding officer in United States military and the mother
9 of two teenage girls. I stay at home to homeschool my daughters. My daughter A.D. is 12 years
10 old and she's transgender. Her gender identity was designated male at birth, but she identifies as
11 female.

12 4. A.D. is an amazing daughter who is excelling in her studies. She tested over 90%
13 in all subjects and is four grades ahead in her math class. She loves playing board games with
14 friends and has a golden retriever she named Apple, who is her best friend. She wants to grow
15 up to be an architect one day. A.D. is extremely kind and empathetic. I decided to homeschool
16 her to shield her from kids mistreating her at school for being transgender.

17 5. Since she was little, A.D. showed preferences for stereotypically female things
18 such as clothes or toys. She'd have a tantrum when we were trying to dress her in boys'
19 clothes. Getting her hair cut was always a big fight, she would resist it and cry that she wanted
20 her hair long. She would ask me why I made a mistake in my belly, and she was born a boy
21 when she was supposed to be a girl.

22 6. At first, her father and I thought this could just be some sort of confusion that
23 would pass with time, but A.D. remained certain of who she was. One pivotal moment
24 happened at Costco when we were shopping for a bathing suit for her swimming lessons. My
25 child threw her small body at the floor and refused to move until I got her a girl's swimsuit.
26

1 We started to worry about her mental health. I realized I needed to listen to her and started
2 researching about transgender children and getting advice from the trans community.

3 7. A.D. socially transitioned, growing her hair out, and changing her pronouns
4 when she was about 5 years old. The positive effect this decision had on A.D.'s life was
5 immediately visible. She went from being a very angry, aggressive little boy prone to daily
6 tantrums to the sweetest little girl. We realized that her behavior was a reflection of how mad she
7 was at not being able to express herself as a girl.

8 8. Supporting A.D. through her transition was absolutely the right decision, but it
9 didn't come without sacrifices. My family is from Georgia and not all of them accept that A.D.
10 is a girl. I no longer speak to my dad because he won't respect who my daughter is. My husband
11 was harassed by supervisors at his job for having a transgender child and has been called out for
12 child abuse. I don't understand how people think any parent would force this on their child. All
13 we're doing is allowing her to be herself and loving her as who she is.

14 9. A.D.'s gender affirming care started with the support of therapists. Conversations about
15 puberty blockers started when she was approaching puberty. She is being treated at Seattle
16 Children's Hospital (SCH) Gender Clinic. Before they can start puberty blockers, kids must
17 have reached a certain level (at a minimum) of sexual development based on the Tanner scale,
18 which is used to assess pubescent development for males and females. In July 2024, she tested
19 at the level required to start receiving puberty blockers. But our health insurance (TRICARE
20 for military families) repeatedly denied the blockers, delaying the process for months, at a
21 critical time when her body's changes can't be reversed. After repeated denials, SCH approved
22 her application for financial aid. Around the same time, suddenly our insurance approved the
23 blockers, which she finally started in January 2025.

24 10. After the President's Executive Order was issued, SCH warned us that they may
25 no longer provide financial aid for gender affirming care because they were risking the loss of
26 all their federal funding. While TRICARE eventually approved the medical care for blockers

1 after five months, they also made it clear that they wouldn't approve any gender affirming care
 2 in the future. Given the politicization of our daughter's medical care and the chilling effects of
 3 the Executive Order, we decided to request a puberty blocker implant for A.D. that lasts for 18
 4 months. If it wasn't for the fear of losing access to care, A.D. wouldn't have received the implant
 5 so soon after getting the shot, which was still active in her system. But we were terrified that in
 6 six months she wouldn't be able to get the puberty blockers and would have to suffer going
 7 through a puberty that doesn't align with her gender identity. It would be devastating for her.
 8 She already struggles with depression, I can't imagine what losing this care would do to her.

9 11. The existence of the Executive Order is already impacting my family and
 10 community. People are terrified of losing access to medical care. We have started thinking about
 11 traveling to another country or getting her a passport if we lose access to medical care here. We
 12 want to have faith in our country that my husband has served longer than we have had children.
 13 I would like to think that I can trust our neighbors, our community. We intend to fight for her
 14 rights. But I can't guarantee my daughter that my love is enough to help her through this. We
 15 are already losing people, transgender people have committed suicide overwhelmed by the
 16 government politics and the hate we are now seeing everywhere. They're being told they
 17 shouldn't exist.

18 12. I am thankful that the Washington State Attorney General's Office is bringing
 19 this lawsuit as there are many reasons I cannot do so as an individual plaintiff. Along with not
 20 having the time, financial resources, or expertise to take on something like this, I would also
 21 greatly fear for my family's safety going against an administration that is against my child's
 22 existence.

23 I declare under penalty of perjury under the laws of the State of Washington and the
 24 United States of America that the foregoing is true and correct.
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1 DATED this 13 day of February 2025.

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3 T.D.
4 Parent of A.D.
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